- 1		
1 2 3	Alyssa A. Qualls (IL Bar No. 6292124) Email: quallsa@sec.gov Amy S. Cotter (IL Bar No. 6238157) Email: cottera@sec.gov Raven A. Winters (IL Bar No. 6291077)	
4	Email: wintersr@sec.gov	
5	Attorneys for Plaintiff David Glockner, Regional Director Robert J. Burson, Associate Regional Director Amy S. Cotter, Assistant Regional Director Alyssa A. Qualls, Regional Trial Counsel Securities and Exchange Commission	
6		
7		
8	175 West Jackson Blvd., Suite 900 Chicago, Illinois 60604	
9	Telephone: (312) 353-7390 Facsimile: (312) 353-7398	
10	UNITED STATES DISTRICT COURT	
11	DISTRICT OF NEVADA	
12	Northern Division	
13		0.40 00070 MMD V/DO
14	SECURITIES AND EXCHANGE COMMISSION,	Case No. 3:16-00270-MMD-VPC
15	Plaintiff,	Honorable Miranda Du
16	vs.	ORDER GRANTING MOTION TO UNSEAL
17	DAVID B. KAPLAN, ESQ.,	WIOTION TO UNSEAD
18	SYNCHRONIZED ORGANIZATIONAL SOLUTIONS, LLC,	
19	SYNCHRONIZED ORGANIZATIONAL	
20	SOLUTIONS INTERNATIONAL, LTD., and MANNA INTERNATIONAL	
21	ENTERPRISES, INC.,	
22	Defendants,	
23	and	
24	LISA M. KAPLAN,	
25	THE WATER-WALKING FOUNDATION, INC., and	
26	MANNA INVESTMENTS, LLC,	
27	Relief Defendants.	

28

Case 3:16-cv-00270-MMD-VPC Document 17 Filed 05/26/16 Page 2 of 2

Pursuant to Local Rule I.A.10-5(a), Plaintiff United States Securities and Exchange Commission ("Commission") moves the Court for an order unsealing the Complaint and other documents filed in this matter. The reasons supporting the Commission's motion are:

The Commission filed this action under seal on May 19, 2016, along with an *ex parte* emergency motion for a temporary restraining order, asset freeze, and other emergency relief in order to halt an ongoing fraudulent scheme and prevent further misappropriation and dissipation of investor funds. Following a hearing, this Court granted the motion on May 20, 2016. The Commission has now served the Court's order on the Defendant David B. Kaplan, Esq. and the financial institutions identified therein. Counsel for Defendant Kaplan has indicated that he will waive service of process and has received copies of the Complaint and other court papers. The Commission is in the process of serving the remaining Defendants and Relief Defendants.

For all of these reasons, the Commission respectfully requests the Court grant its motion to unseal on the Complaint and filings in this matter.

Respectfully submitted this 24th day of May, 2016.

U.S. Securities and Exchange Commission

/s/ Alyssa A. Qualls
Alyssa A. Qualls
Senior Trial Counsel

IT IS SO ORDERED:

Honorable Miranda Du United States District Judge

DATED: May 26, 2016